



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2270

DATE SCANNED 9/9/11

SCANNER NO. 2

SCAN OPERATOR SES

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 31, 2011

MEMORANDUM

TO: THE COMMISSION

THROUGH: ALEC PALMER  
ACTING STAFF DIRECTOR

FROM: PATRICIA CARMONA *PC*  
CHIEF COMPLIANCE OFFICER

DEBBIE CHACONA *DC*  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

BY: *JW* JODI WINSHIP/SARI PICKERALL *JP*  
COMPLIANCE BRANCH

SUBJECT: REASON TO BELIEVE RECOMMENDATION – 2010 12 DAY PRE-  
GENERAL REPORT (UNAUTHORIZED COMMITTEES – MONTHLY  
FILERS) FOR THE ADMINISTRATIVE FINE PROGRAM

Attached is a list of political committees and their treasurers who failed to file or timely file the 2010 12 Day Pre-General Report in accordance with 2 U.S.C. 434(a). The list is comprised of unauthorized committees that file monthly.

The committees appearing on the list either filed the report more than five (5) days after the due date, failed to file the report or failed to file the report prior to four (4) days before the November 2, 2010 General Election (considered a non-filed report). In accordance with the schedule of civil money penalties at 11 CFR 111.43, these committees should be assessed the civil money penalties outlined on the attached Reason to Believe (RTB) circulation list.

**Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

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Federal Election Commission  
Reason to Believe Circulation Report  
2010 PRE-GENERAL Election Sensitive 10/21/2010 UNAUTH\_M

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2265	C00005462	10TH DISTRICT REPUBLICAN CONGRESSIONAL COMMITTEE		MELINDA CONNER	\$163,007	1	10/28/2010	7	\$256	\$156
2266	C00230342	21ST CENTURY DEMOCRATS		BILL COMBS	\$4,051,981	0	11/19/2010	Not Filed	\$74,736	\$3,300
2267	080253280	ALASKA REPUBLICAN PARTY		GLENN W. CLARY	\$1,240,832	0	11/17/2010	Not Filed	\$429,926	\$11,000
2268	C00176727	AMERICAN ASSOCIATION OF AIRPORT EXECUTIVES		TODD HAUPTLI	\$135,842	0	10/27/2010	6	\$2,500	\$115
2269	C00143560	AMERICAN DIETETIC ASSOCIATION POLITICAL ACTION COMMITTEE		PAUL MIFSUD	\$921,430	0	11/15/2010	Not Filed	\$4,793	\$550
2270	C00041061	AMERICAN PILOTS' ASSOCIATION POLITICAL ACTION COMMITTEE		CAPTAIN MICHAEL R. WATSON	\$206,321	3	11/22/2010	Not Filed	\$7,000	\$1,155
2271	C00333104	AMERICAN SOCIETY OF PENSION PROFESSIONALS & ACTUARIES PAC		BRIAN H. GRAFF, ESQ.	\$394,054	0	10/27/2010	6	\$5,175	\$170
2272	C00021295	BRACEPAC		SCOTT SEGAL	\$387,375	0	11/3/2010	Not Filed	\$2,500	\$550
2273	C00072967	COMMERCE BANCS PAC		ROBERT LAY	\$116,061	0	11/17/2010	Not Filed	\$3,245	\$550
2274	C00131607	FLORIDA CITRUS MUTUAL POLITICAL ACTION COMMITTEE		KEVIN E. METHENY	\$140,075	0	11/4/2010	Not Filed	\$5,000	\$660
2275	C00431874	FOLLOW THE NORTH STAR FUND		GERALD PATRICK HALBACH	\$779,895	0	11/8/2010	Not Filed	\$3,135	\$550
2276	C00473249	GRAND CANYON STATE CAUCUS		PATRICIA NAST BERAN	\$113,601	0	11/2/2010	Not Filed	\$4,250	\$550
2277	C00428094	INTEGRAPAC OF INTEGRA TELECOM HOLDINGS INC.		DALE PERRY	\$342,057	0	10/29/2010	Not Filed	\$4,941	\$550
2278	C00394650	JBS UBA LLC PAC		DENNIS ROERTY	\$294,127	0	11/19/2010	Not Filed	\$7,674	\$660

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2279	C00382796	LOUISIANA HEALTH CARE GROUP EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE INC		ALBERT SIMIEN	\$146,995	0	11/18/2010	Not Filed	\$8,800	\$660
2280	C00247403	NORPAC		KAREN PICHKHADZE	\$2,411,867	0	10/27/2010	6	\$56,172	\$990
2281	C00374298	PEANUT BUYING POINT PAC AKA PBP-PAC		J. TYRON SPEARMAN	\$124,691	0	11/15/2010	Not Filed	\$1,000	\$550
2282	C00009639	SUNTRUST BANK GOOD GOVERNMENT GROUP - GEORGIA		CHRISTIAN D. BEYERS	\$235,868	0	11/8/2010	Not Filed	\$13,250	\$990
2283	C00202861	THE SENATE VICTORY FUND PAC		JOHN M. ROBINSON, CPA	\$1,105,768	0	11/9/2010	Not Filed	\$14,686	\$990

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation - 2010 )  
12 Day Pre-General Report (Unauthorized )  
Committees - Monthly Filers) for the )  
Administrative Fine Program: )  
10TH DISTRICT REPUBLICAN ) AF# 2265  
CONGRESSIONAL COMMITTEE, and )  
CONNER, MELINDA as treasurer; )  
AMERICAN ASSOCIATION OF ) AF# 2268  
AIRPORT EXECUTIVES, and HAUPTLI, )  
TODD as treasurer; )  
AMERICAN SOCIETY OF PENSION ) AF# 2271  
PROFESSIONALS & ACTUARIES PAC, )  
and BRIAN H.MR. GRAFF ESQ. as )  
treasurer; )  
NORPAC, and PICHKHADZE, KAREN as ) AF# 2280  
treasurer; )  
21ST CENTURY DEMOCRATS, and ) AF# 2266  
BILL COMBS as treasurer; )  
ALASKA REPUBLICAN PARTY, and ) AF# 2267  
GLENN W. CLARY as treasurer; )  
AMERICAN DIETETIC ASSOCIATION ) AF# 2269  
POLITICAL ACTION COMMITTEE, and )  
MIFSUD, PAUL as treasurer; )  
AMERICAN PILOTS' ASSOCIATION ) AF# 2270  
POLITICAL ACTION COMMITTEE, and )  
CAPTAIN MICHAEL R WATSON as )  
treasurer; )  
BRACEPAC, and SEGAL, SCOTT as ) AF# 2272  
treasurer; )  
COMMERCE BANCS PAC, and ROBERT ) AF# 2273  
LAY as treasurer; )  
FLORIDA CITRUS MUTUAL ) AF# 2274  
POLITICAL ACTION COMMITTEE, and )  
KEVIN E. METHENY as treasurer; )  
FOLLOW THE NORTH STAR FUND, and ) AF# 2275  
HALBACH, GERALD PATRICK MR. as )  
treasurer; )  
GRAND CANYON STATE CAUCUS, and ) AF# 2276  
BERAN, PATRICIA NAST as treasurer; )

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Federal Election Commission  
Certification for Administrative Fines  
February 02, 2011

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INTEGRAPAC OF INTEGRA TELECOM	)	AF# 2277
HOLDINGS INC., and DALE PERRY as	)	
treasurer;	)	
JBS USA LLC PAC, and ROERTY,	)	AF# 2278
DENNIS as treasurer;	)	
LOUISIANA HEALTH CARE GROUP	)	AF# 2279
EMPLOYEE FEDERAL POLITICAL	)	
ACTION COMMITTEE INC, and SIMIEN,	)	
ALBERT as treasurer;	)	
PEANUT BUYING POINT PAC AKA	)	AF# 2281
PBP-PAC, and J TYRON SPEARMAN as	)	
treasurer;	)	
SUNTRUST BANK GOOD	)	AF# 2282
GOVERNMENT GROUP - GEORGIA,	)	
and BEYERS, CHRISTIAN D. MR. as	)	
treasurer;	)	
THE SENATE VICTORY FUND PAC, and	)	AF# 2283
ROBINSON, JOHN M. CPA as treasurer;	)	

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on February 02, 2011 the Commission took the following actions on the Reason To Believe Recommendation - 2010 12 Day Pre-General Report (Unauthorized Committees - Monthly Filers) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated January 31, 2011, on the following committees:

AF#2265 Decided by a vote of 6-0 to: (1) find reason to believe that 10TH DISTRICT REPUBLICAN CONGRESSIONAL COMMITTEE, and CONNER, MELINDA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2268 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN ASSOCIATION OF AIRPORT EXECUTIVES, and HAUPTLI, TODD as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2271 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN SOCIETY OF PENSION PROFESSIONALS & ACTUARIES PAC, and BRIAN H.MR. GRAFF ESQ. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2280 Decided by a vote of 6-0 to: (1) find reason to believe that NORPAC, and PICHKHADZE, KAREN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2266 Decided by a vote of 6-0 to: (1) find reason to believe that 21ST CENTURY DEMOCRATS, and BILL COMBS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2267 Decided by a vote of 6-0 to: (1) find reason to believe that ALASKA REPUBLICAN PARTY, and GLENN W. CLARY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2269 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN DIETETIC ASSOCIATION POLITICAL ACTION COMMITTEE, and MIFSUD, PAUL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2270 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN PILOTS' ASSOCIATION POLITICAL ACTION COMMITTEE, and CAPTAIN MICHAEL R. WATSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2272 Decided by a vote of 6-0 to: (1) find reason to believe that BRACEPAC, and SEGAL, SCOTT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2273 Decided by a vote of 6-0 to: (1) find reason to believe that COMMERCE BANCS PAC, and ROBERT LAY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2274 Decided by a vote of 6-0 to: (1) find reason to believe that FLORIDA CITRUS MUTUAL POLITICAL ACTION COMMITTEE, and KEVIN E. METHENY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2275 Decided by a vote of 6-0 to: (1) find reason to believe that FOLLOW THE NORTH STAR FUND, and HALBACH, GERALD PATRICK MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2276 Decided by a vote of 6-0 to: (1) find reason to believe that GRAND CANYON STATE CAUCUS, and BERAN, PATRICIA NAST as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2277 Decided by a vote of 6-0 to: (1) find reason to believe that INTEGRAPAC OF INTEGRA TELECOM HOLDINGS INC., and DALE PERRY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2278 Decided by a vote of 6-0 to: (1) find reason to believe that JBS USA LLC PAC, and ROERTY, DENNIS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on

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the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2279 Decided by a vote of 6-0 to: (1) find reason to believe that LOUISIANA HEALTH CARE GROUP EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE INC, and SIMIEN, ALBERT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.


AF#2281 Decided by a vote of 6-0 to: (1) find reason to believe that PEANUT BUYING POINT PAC AKA PBP-PAC, and J TYRON SPEARMAN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2282 Decided by a vote of 6-0 to: (1) find reason to believe that SUNTRUST BANK GOOD GOVERNMENT GROUP - GEORGIA, and BEYERS, CHRISTIAN D. MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2283 Decided by a vote of 6-0 to: (1) find reason to believe that THE SENATE VICTORY FUND PAC, and ROBINSON, JOHN M. CPA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

February 4, 2011  
Date

  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 7, 2011

Captain Michael R. Watson, in official capacity as Treasurer  
American Pilots' Association Political Action Committee  
499 South Capitol Street, SW, #409  
Washington, DC 20003

C00041061  
AF#: 2270

Dear Captain Watson:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 12 Day Pre-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period through October 13, 2010, shall be filed no later than October 21, 2010. 2 U.S.C. § 434(a). Because records at the Federal Election Commission ("FEC") indicate that this report was not filed prior to four (4) days before the General Election held on November 2, 2010, it is considered not filed for the purpose of calculating the civil money penalty.

The Act was further amended in 1999 to permit the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On February 2, 2011, the FEC found that there is reason to believe ("RTB") that American Pilots' Association Political Action Committee and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file timely this report on or before October 21, 2010. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$1,155. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. Your payment of \$1,155 is due within forty (40) days of the finding, or by March 14, 2011, and is based on these factors:

Election Sensitivity of Report: Election Sensitive

Level of Activity: \$7,000

Number of Days Late: Not Filed (reports not filed prior to four (4) days before the General Election held on November 2, 2010 are considered not filed for the purpose of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 3

At this juncture, the following courses of action are available to you:

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### 1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or March 14, 2011. 11 C.F.R. § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 C.F.R. § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 C.F.R. § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 C.F.R. § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 C.F.R. § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

### 2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that American Pilots' Association Political Action Committee and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection

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Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. § 111.51(a)(2).

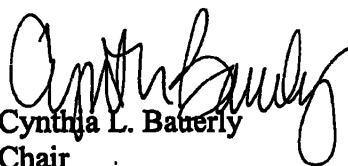
**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

  
Cynthia L. Bauerly  
Chair

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at RTB is \$1,155 for the 2010 Pre-General Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by March 14, 2011. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

FOR: American Pilots' Association Political Action Committee

FEC ID#: C00041061

AF#: 2270

PAYMENT DUE DATE: March 14, 2011

PAYMENT AMOUNT DUE: \$1,155

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 16, 2011

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer  
Acting Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *W* Jodi Winship/Sari Pickeral *SP*  
Compliance Branch

SUBJECT: Administrative Fine Program - Final Determination Recommendation for the  
2010 12 Day Pre-General Report (Unauthorized Committees-Monthly Filers)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2010 12 Day Pre-General Report (Unauthorized Committees-Monthly Filers). The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, due to database errors at RTB, the civil money penalty was incorrectly calculated for American Pilots' Association Political Action Committee (AF 2270). As such, the fine should be lowered from \$1,155 to \$990. The committee paid \$1,155 (see first list); thus, we will issue a refund for the difference (\$165).

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**RAD Recommendation**

- (1) Make final determination that the political committees and their treasurers listed on the attached reports violated 2 U.S.C. § 434(a) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

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Federal Election Commission  
FD Circulation Report Fine Paid  
2010 PRE-GENERAL Election Sensitive 10/21/2010 UNAUTH\_M

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
2265	10TH DISTRICT REPUBLICAN CONGRESSIONAL COMMITTEE		C00005462	MELINDA CONNER	10/29/2010	7	\$256	1	02/02/2011	\$156	\$156	03/17/2011	\$156
2268	AMERICAN ASSOCIATION OF AIRPORT EXECUTIVES		C00176727	TODD HAUPTLI	10/27/2010	6	\$2,500	0	02/02/2011	\$115	\$115	02/14/2011	\$115
2269	AMERICAN DIETETIC ASSOCIATION POLITICAL ACTION COMMITTEE		C00143580	PAUL MIFSUD	11/15/2010	Not Filed	\$4,783	0	02/02/2011	\$550	\$550	02/17/2011	\$550
2270	AMERICAN PILOTS' ASSOCIATION POLITICAL ACTION COMMITTEE		C00041081	CAPTAIN MICHAEL R. WATSON	11/22/2010	Not Filed	\$7,000	2	02/02/2011	\$1,155	\$990	3/14/2011	\$1,155*
2271	AMERICAN SOCIETY OF PENSION PROFESSIONALS & ACTUARIES PAC		C00333104	BRIAN H. GRAFF, ESQ.	10/27/2010	6	\$5,175	0	02/02/2011	\$170	\$170	02/21/2011	\$170
2272	BRAGEPAC		C00021295	SCOTT SEGAL	11/03/2010	Not Filed	\$2,500	0	02/02/2011	\$550	\$550	02/15/2011	\$550
2273	COMMERCE BANKS PAC		C00072987	ROBERT LAY	11/17/2010	Not Filed	\$3,245	0	02/02/2011	\$550	\$550	03/14/2011	\$550
2274	FLORIDA CITRUS MUTUAL POLITICAL ACTION COMMITTEE		C00131607	KEVIN E. METHENY	11/04/2010	Not Filed	\$5,000	0	02/02/2011	\$660	\$660	02/25/2011	\$660
2275	FOLLOW THE NORTH STAR FUND		C00431874	GERALD PATRICK HALBACH	11/08/2010	Not Filed	\$3,135	0	02/02/2011	\$550	\$550	03/14/2011	\$550
2276	GRAND CANYON STATE CAUCUS		C00473249	PATRICIA NAST BERAN	11/02/2010	Not Filed	\$4,250	0	02/02/2011	\$550	\$550	03/08/2011	\$550
2277	INTEGRAPAC OF INTEGRA		C00428094	DALE PERRY	10/29/2010	Not Filed	\$4,941	0	02/02/2011	\$550	\$550	03/08/2011	\$550
2278	TELECOM HOLDINGS INC. JBS USA LLC PAC		C00394650	DENNIS ROERTY	11/19/2010	Not Filed	\$7,674	0	02/02/2011	\$660	\$660	02/28/2011	\$660
2279	LOUISIANA HEALTH CARE GROUP EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE INC		C00382796	ALBERT SIMIEN	11/18/2010	Not Filed	\$8,800	0	02/02/2011	\$660	\$660	03/10/2011	\$660
2280	NORPAC		C00247403	KAREN PICHKHADZE	10/27/2010	6	\$56,172	0	02/02/2011	\$990	\$990	02/25/2011	\$990
2281	PEANUT BUYING POINT PAC AKA PBR-PAC		C00374298	J. TYRON SPEARMAN	11/15/2010	Not Filed	\$1,000	0	02/02/2011	\$550	\$550	02/14/2011	\$550
2282	SUNTRUST BANK GOOD GOVERNMENT GROUP - GEORGIA		C00008638	CHRISTIAN D. BEYERS	11/08/2010	Not Filed	\$13,250	0	02/02/2011	\$980	\$980	03/11/2011	\$980
2283	THE SENATE VICTORY FUND PAC		C00202861	JOHN M. ROBINSON, CPA	11/09/2010	Not Filed	\$14,686	0	02/02/2011	\$990	\$990	03/03/2011	\$990

\* AF 2270 American Pilots' Association Political Action Committee paid the fine according to the RTB fine amount. However, due to database errors the fine was recalculated and a discrepancy was found. The fine was recalculated at FD and the committee will receive a refund for the overpaid amount.

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5/18/2011 3:00 PM

Federal Election Commission  
FD Circulation Report Fine Not Paid  
2010 PRE-GENERAL Election Sensitive 10/21/2010 UNAUTH\_M

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
2288	21ST CENTURY DEMOCRATS		C00230342	BILL COMBS	11/18/2010	Not Filed	\$74,736	0	02/02/2011	\$3,300	103	\$3,300

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fines - Final Determination )  
Recommendation for the 12 Day 2010 Pre- )  
General (Unauthorized Committees- )  
Monthly Filers): )  
10TH DISTRICT REPUBLICAN ) AF# 2265  
CONGRESSIONAL COMMITTEE, and )  
CONNER, MELINDA as treasurer; )  
AMERICAN ASSOCIATION OF ) AF# 2268  
AIRPORT EXECUTIVES, and HAUPTLI, )  
TODD as treasurer; )  
AMERICAN SOCIETY OF PENSION ) AF# 2271  
PROFESSIONALS & ACTUARIES PAC, )  
and BRIAN H.MR. GRAFF ESQ. as )  
treasurer; )  
NORPAC, and PICHKHADZE, KAREN as ) AF# 2280  
treasurer; )  
21ST CENTURY DEMOCRATS, and ) AF# 2266  
BILL COMBS as treasurer; )  
AMERICAN DIETETIC ASSOCIATION ) AF# 2269  
POLITICAL ACTION COMMITTEE, and )  
MIFSUD, PAUL as treasurer; )  
AMERICAN PILOTS' ASSOCIATION ) AF# 2270  
POLITICAL ACTION COMMITTEE, and )  
CAPTAIN MICHAEL R WATSON as )  
treasurer; )  
BRACEPAC, and SEGAL, SCOTT as ) AF# 2272  
treasurer; )  
COMMERCE BANCS PAC, and ROBERT ) AF# 2273  
LAY as treasurer; )  
FLORIDA CITRUS MUTUAL ) AF# 2274  
POLITICAL ACTION COMMITTEE, and )  
KEVIN E. METHENY as treasurer; )  
FOLLOW THE NORTH STAR FUND, and ) AF# 2275  
HALBACH, GERALD PATRICK MR. as )  
treasurer; )

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GRAND CANYON STATE CAUCUS, and	AF# 2276
BERAN, PATRICIA NAST as treasurer;	
INTEGRAPAC OF INTEGRA TELECOM )	AF# 2277
HOLDINGS INC., and DALE PERRY as )	
treasurer; )	
JBS USA LLC PAC, and ROERTY, )	AF# 2278
DENNIS as treasurer; )	
LOUISIANA HEALTH CARE GROUP )	AF# 2279
EMPLOYEE FEDERAL POLITICAL )	
ACTION COMMITTEE INC, and SIMIEN, )	
ALBERT as treasurer; )	
PEANUT BUYING POINT PAC AKA )	AF# 2281
PBP-PAC, and J TYRON SPEARMAN as )	
treasurer; )	
SUNTRUST BANK GOOD )	AF# 2282
GOVERNMENT GROUP - GEORGIA, )	
and BEYERS, CHRISTIAN D. MR. as )	
treasurer; )	
THE SENATE VICTORY FUND PAC, and )	AF# 2283
ROBINSON, JOHN M. CPA as treasurer; )	

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on May 18, 2011 the Commission took the following actions on the Administrative Fines - Final Determination Recommendation for the 12 2010 Day Pre-General (Unauthorized Committees-Monthly Filers) as recommended in the Reports Analysis Division's Memorandum dated May 16, 2011, on the following committees:

AF#2265 Decided by a vote of 6-0 to: (1) make a final determination that 10TH DISTRICT REPUBLICAN CONGRESSIONAL COMMITTEE, and CONNER, MELINDA as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2268 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN ASSOCIATION OF AIRPORT EXECUTIVES, and HAUPTLI, TODD as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2271 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN SOCIETY OF PENSION PROFESSIONALS & ACTUARIES PAC, and BRIAN H.MR. GRAFF ESQ. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2280 Decided by a vote of 6-0 to: (1) make a final determination that NORPAC, and PICHKHADZE, KAREN as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2266 Decided by a vote of 6-0 to: (1) make a final determination that 21ST CENTURY DEMOCRATS, and BILL COMBS as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2269 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN DIETETIC ASSOCIATION POLITICAL ACTION COMMITTEE, and MIFSUD, PAUL as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2270 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN PILOTS' ASSOCIATION POLITICAL ACTION COMMITTEE, and CAPTAIN MICHAEL R WATSON as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2272 Decided by a vote of 6-0 to: (1) make a final determination that BRACEPAC, and SEGAL, SCOTT as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2273 Decided by a vote of 6-0 to: (1) make a final determination that COMMERCE BANCS PAC, and ROBERT LAY as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2274 Decided by a vote of 6-0 to: (1) make a final determination that FLORIDA CITRUS MUTUAL POLITICAL ACTION COMMITTEE, and KEVIN E. METHENY as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2275 Decided by a vote of 6-0 to: (1) make a final determination that FOLLOW THE NORTH STAR FUND, and HALBACH, GERALD PATRICK MR. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2276 Decided by a vote of 6-0 to: (1) make a final determination that GRAND CANYON STATE CAUCUS, and BERAN, PATRICIA NAST as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2277 Decided by a vote of 6-0 to: (1) make a final determination that INTEGRAPAC OF INTEGRA TELECOM HOLDINGS INC., and DALE PERRY as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2278 Decided by a vote of 6-0 to: (1) make a final determination that JBS USA LLC PAC, and ROERTY, DENNIS as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2279 Decided by a vote of 6-0 to: (1) make a final determination that LOUISIANA HEALTH CARE GROUP EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE INC, and SIMIEN, ALBERT as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2281 Decided by a vote of 6-0 to: (1) make a final determination that PEANUT BUYING POINT PAC AKA PBP-PAC, and J TYRON SPEARMAN as treasurer,

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violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2282 Decided by a vote of 6-0 to: (1) make a final determination that SUNTRUST BANK GOOD GOVERNMENT GROUP - GEORGIA, and BEYERS, CHRISTIAN D. MR. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2283 Decided by a vote of 6-0 to: (1) make a final determination that THE SENATE VICTORY FUND PAC, and ROBINSON, JOHN M. CPA as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

May 19, 2011  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 19, 2011

Captain Michael R. Watson, in official capacity as Treasurer  
American Pilots' Association Political Action Committee  
499 South Capitol Street, SW #409  
Washington, DC 20003

C00041061  
AF#: 2270

Dear Captain Watson:

On February 2, 2011, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that American Pilots' Association Political Action Committee and its treasurer violated 2 U.S.C. § 434(a) for filing late or failing to file the 2010 Pre-General Report. By letter dated February 7, 2011, the Commission sent notification of the RTB finding that included a civil money penalty calculated at the RTB stage of \$1,155 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. The amount of the civil money penalty has been changed to reflect the actual number of previous civil money penalties assessed.

On March 14, 2011, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on May 18, 2011 that you, in your official capacity as treasurer, and American Pilots' Association Political Action Committee violated 2 U.S.C. § 434(a), assessed a civil money penalty in the amount of \$990 in accordance with 11 C.F.R. § 111.43, and voted to close the file. Please note, the Commission will be issuing a refund of \$165.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding this matter, please contact Sari Pickerall on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,

  
Cynthia L. Bauerly  
Chair

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PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: American Pilots' Association Political Action Committee

FEC ID#: C00041061

AF#: 2270

PAYMENT DUE DATE: March 14, 2011

PAYMENT AMOUNT DUE: \$1,155

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058  
SEQ# 002 \$ 0000115500 BA# 2 03-14-11 20 4



**us bancorp.**  
First Bank Company

<b>THE AMERICAN PILOTS' ASSOC INC</b> <b>POLITICAL ACTION COMMITTEE</b> 499 S. CAPITOL STREET, S.W. SUITE 400 WASHINGTON, DC 20003		<b>3251</b>
<b>PAY TO THE ORDER OF</b> Federal Election Commission		<b>3/11/2011</b>
One Thousand One Hundred Fifty-Five and 00/100		<b>\$ 1,155.00</b>
Federal Election Commission/ P.O. Box 979058 St. Louis, MO 63197-8000		<b>DOLLARS</b>
<b>MEMO</b> AF# 2270 FEC ID #C00041061		



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2270

DATE SCANNED

9/9/11

SCANNER NO.

2

SCAN OPERATOR

ESS

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